

ORIGINAL

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
 Amendments of Parts 15 and 90 )  
 of the Commission's Rules to )  
 Provide Additional Frequencies )  
 for Cordless Telephones )

ET Docket No. 93-235

To: The Commission

MOTION FOR EXTENSION OF TIME

The American Petroleum Institute ("API"), pursuant to Section 1.46 of the Rules and Regulations of the Federal Communications Commission ("Commission"), by its attorneys, hereby respectfully submits this Motion for Extension of Time to file Comments and Reply Comments in the above-styled proceeding.<sup>1/</sup>

**I. PRELIMINARY STATEMENT**

1. API is a national trade association representing approximately 300 companies involved in all phases of the petroleum and natural gas industries, including exploration, production, refining, marketing, and transportation of

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<sup>1/</sup> Notice of Proposed Rulemaking ("Notice"), FCC 92-20, ET Docket No. 93-235 (Released: September 17, 1993). The Comments and Reply Comments dates for responding to this Notice are now November 8, 1993, and November 23, 1993, respectively.

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petroleum, petroleum products and natural gas. Among its many activities, API acts on behalf of its members as a spokesperson before federal and state regulatory agencies. The API Telecommunications Committee is one of the standing committees of the organization's Information Systems Committee. The Telecommunications Committee evaluates and develops responses to state and federal proposals affecting telecommunications facilities used in the oil and gas industries.

2. The Commission has proposed in this matter to amend its rules to permit the operation of cordless telephones on fifteen (15) channels in the 48/49 MHz bands that are currently dedicated for two-way mobile radio use in the Petroleum and forest Products Radio Service. API's membership includes many licensees in the Petroleum Radio Service ("PRS") who are authorized by the Commission to employ these channels for critical mobile radio communication systems. These licensees are deeply concerned with the ultimate consequences that would follow adoption of the Commission's proposal. Accordingly, API and its members are currently engaged in an evaluation of the proposal and a review of the utilization made of those channels targeted for cordless telephone use.

## II. MOTION FOR EXTENSION

3. API's Telecommunications Committee will hold its regular fall meeting November 17-19, 1993, approximately 10 days following the date set by the Commission for filing comments in this proceeding. The Committee is most desirous of devoting a portion of that meeting to a full examination of the issues presented by the Commission's proposal and to a detailed review of draft Comments it wishes to distribute prior to that session. Accordingly, the Commission is respectfully requested to extend the dates for filing Comments and Reply Comments in this matter for a period of 30 days, or until December 8 and 23, 1993, respectively.

4. A grant of this motion will facilitate a full discussion of the issue at the Telecommunications Committee's meeting and finalization of its Comments which are essential for the development of a full record in this matter. The Commission observed in the Notice that manufacturers of cordless telephones have been seeking an expanded spectrum allocation since 1987. Consequently, it is submitted that the minimal extension sought by API will not have a material adverse effect on any known party. It will permit the thorough examination of all issues and submission of meaningful Comments by an organization that

represents a significant number of licensees who may be adversely affected by ultimate adoption of the rules changes proposed in this proceeding.

**WHEREFORE, THE PREMISES CONSIDERED,** the American Petroleum Institute respectfully requests the Federal Communications Commission to extend the dates for the filing of Comments and Reply Comments in this proceeding to December 8 and 23, 1993, respectively.

Respectfully submitted,

**THE AMERICAN PETROLEUM INSTITUTE**

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Its Attorneys

Dated: October 18, 1993

**CERTIFICATE OF SERVICE**

I, Patt Meyer, a secretary in the law firm of Keller and Heckman, do hereby certify that a copy of the foregoing "Motion for Extension of Time" has been hand-delivered to the following on this 18th day of October, 1993.

The Honorable James H. Quello  
Acting Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

The Honorable Andrew C. Barrett  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Room 844  
Washington, D.C. 20554

The Honorable Ervin S. Duggan  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 20554

Dr. Thomas P. Stanley  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
2025 M Street, N.W., Room 7002  
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Mr. Ralph Haller  
Chief, Private Radio Bureau  
Federal Communications Commission  
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Patt Meyer